

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

KELVIN THOMAS, on behalf of himself and
others similarly situated,

Plaintiff,

v.

BACKGROUNDCHECKS.COM (in its own
name and trading as ebackgroundchecks.com),

Defendant.

Civil Action No. 3:13cv029

DECLARATION OF ROSS D. ANDRE


Pursuant to 28 U.S.C. § 1746, I, Ross D. Andre, declare as follows:

1. My name is Ross Andre. I am over 21 years of age and am competent to give testimony.
2. I am an attorney with the law firm of Kilpatrick Townsend & Stockton LLP (the “Firm”) in Atlanta, GA. I have been employed by the Firm since January 2011.
3. At the request of Cindy Hanson, one of the partners in the Firm, I assisted with providing notice of the settlement between Plaintiff and Backgroundchecks.com as required by the Class Action Fairness Act of 2005, 28 U.S.C. § 1711 *et seq.*
4. Attached hereto as Exhibit A is a true and correct copy of a letter that I sent via UPS Overnight Delivery to Eric Holder, the Attorney General for the United States of America, on February 23, 2015.
5. Attached hereto as Exhibit B is a true and correct copy of a letter that I sent via UPS Overnight Delivery to Richard Cordray, the Director of the Consumer Financial Protection Bureau, on February 23, 2015.

6. Attached hereto as Exhibit C is a true and correct copy of a letter that I sent via UPS Overnight Delivery to the Attorney General for the State of Alabama on February 23, 2015. The body of this letter is identical to the body of letters I sent via UPS Overnight Delivery to the Attorneys General and regulators for every other state, the District of Columbia, and every U.S. territory, all on February 23, 2015. A list of these Attorneys General and regulators and their addresses to which I sent the foregoing notices is attached hereto as Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct.

This 24th day of February, 2015.


ROSS D. ANDRE